

BCB CHEYENNE LLC d/b/a BISON
BLOCKCHAIN, a Wyoming limited liability
company,

Plaintiff,

v.

MINEONE WYOMING DATA CENTER
LLC, a Delaware limited liability company;
MINEONE PARTNERS LLC, a Delaware
limited liability company; TERRA CRYPTO
INC., a Delaware corporation; BIT ORIGIN,
LTD, a Cayman Island Company;
SONICASH LLC, a Delaware limited
liability company; BITMAIN
TECHNOLOGIES HOLDING COMPANY, a
Cayman Island Company; BITMAIN
TECHNOLOGIES GEORGIA LIMITED, a
Georgia corporation; and JOHN DOES 1-20,
related persons and companies who control or
direct some or all of the named Defendants.

Defendants.

**DEFENDANTS' REQUEST FOR EXTENSION TO RESPOND TO
PLAINTIFF'S FIRST MOTION TO COMPEL DISCOVERY FROM
DEFENDANTS MINEONE WYOMING DATA CENTER, LLC, AND
TERRA CRYPTO, INC. [ECF No. 124]**

COME NOW Defendants MineOne Wyoming Data Center LLC, MineOne Partners LLC, and Terra Crypto Inc., by and through counsel, HATHAWAY & KUNZ, LLP, and LOEB & LOEB LLC, and hereby request an extension of time to respond to *Plaintiff's Motion to Compel Discovery from Defendants MineOne Wyoming Data Center, LLC and Terra Crypto, Inc.* (ECF No. 124). Lead counsel for these Defendants will be traveling and is unable to provide a substantive response until early next week. Additionally, counsel needs to obtain input from the clients prior to filing. As such, these Defendants request an extension of up to and including March 13, 2024 in which to file their response to *Plaintiff's Motion to Compel* (ECF No. 124). These Defendants have conferred with counsel for the other parties in this matter. Plaintiff's counsel, Bitmain's counsel, SonicHash and Bit Origin's counsel all advised that they do not object to the extension request.

WHEREFORE Defendants MineOne Wyoming Data Center LLC, MineOne Partners LLC, and Terra Crypto Inc. request this Court enter an order granting an extension of up to and including March 13, 2024 in which to respond to Plaintiff's *Motion to Compel* (ECF No. 124).

DATED this 7th day of March, 2024.

/s/ Kari Hartman

Sean Larson Wyo. Bar #7-5112
Kari Hartman, Wyo. Bar #8-6507
HATHAWAY & KUNZ, LLP
P. O. Box 1208
Cheyenne, WY 82003
Phone: (307) 634-7723
Fax: (307) 634-0985
slarson@hkwyolaw.com
khartman@hkwyolaw.com

Paula K. Colbath, Esq. (Admitted *Pro Hac Vice*)
Sarah Levitan Perry, Esq. (Admitted *Pro Hac Vice*)
Alex Inman, Esq. (Admitted *Pro Hac Vice*)
345 Park Avenue
New York, NY 10154
Telephone: 212-407-4905
Fax: 212-407-4990

ATTORNEYS FOR DEFENDANTS
MINEONE WYOMING DATA CENTER LLC, a Delaware limited liability company; MINEONE PARTNERS LLC, a Delaware limited liability company; TERRA CRYPTO INC., a Delaware corporation

CERTIFICATE OF SERVICE

This is to certify that on the 7th day of March, 2024, a true and correct copy of the foregoing was served upon counsel as follows:

Patrick J. Murphy
Scott C. Murray
Williams, Porter, Day & Neville, P.C.
159 N. Wolcott., Suite 400
P.O. Box 10700 (82602)
Casper, WY 82601
Attorneys for Plaintiff

☒ CM/ECF
☐ Fax:
☐ E-mail:
pmurphy@wpdn.net
smurray@wpdn.net

Khale J. Lenhart
Tyson R. Woodford
Hirst Applegate, LLP
P. O. Box 1083
Cheyenne, WY 82003-1083

☒ CM/ECF
☐ Fax:
☐ E-mail:
klenhart@hirstapplegate.com
twoodford@hirstapplegate.com

Marc Feinstein, *pro hac vice*
William K. Pao, *pro hac vice*
O'Melveny & Myers, LLP
400 South Hope Street, 18th Floor
Los Angeles, CA 90071
Attorneys for Bitmain Technologies Georgia Limited

☒ CM/ECF
☐ Fax:
☐ E-mail:
mfeinstein@omm.com
wpao@omm.com

Meggan J. Hathaway
Jane M. France
Sundahl, Powers, Kapp & Martin, L.L.C.
500 W. 18th Street, Suite 200
Cheyenne, WY 82003-0328

☒ CM/ECF
☐ Fax:
☐ E-mail:
mhathaway@spkm.org
jfrance@spkm.org

Marc S. Gottlieb
Ortoli Rosenstadt, LLP
366 Madison Avenue, 3rd Floor
New York, NY 10017
Attorneys for Bit Origin and SonicHash

☒ CM/ECF
☐ Fax:
☐ E-mail:
msg@orllp.legal

/s/ Candice Hough
Hathaway & Kunz, LLP